

David R. Doyle

From: Eric Soehnlein <esoehnlein@lippes.com>
Sent: Wednesday, October 12, 2016 11:10 AM
To: David R. Doyle
Cc: Terence G. Banich
Subject: RE: Stark -- subpoenas

Thanks for the note.

I apologize that this fell off my radar. Let me review and get back to you.

-Eric

From: David R. Doyle [mailto:ddoyle@shawfishman.com]
Sent: Wednesday, October 12, 2016 12:06 PM
To: Eric Soehnlein
Cc: Terence G. Banich
Subject: RE: Stark -- subpoenas

Eric:

The Receiver has not received any response to the subpoena from your clients. We will assume that your clients do not intend to respond and will seek appropriate relief.

Dave

David R. Doyle
Shaw Fishman Glantz & Towbin LLC
321 North Clark Street, Suite 800
Chicago, Illinois 60654
Telephone (direct): 312.980.3864
Facsimile: 312.980.3888
E-mail: ddoyle@shawfishman.com

From: David R. Doyle
Sent: Tuesday, September 13, 2016 11:00 AM
To: 'Eric Soehnlein' <esoehnlein@lippes.com>
Cc: Robert Fishman <rfishman@shawfishman.com>; Terence G. Banich <tbanich@shawfishman.com>
Subject: Stark -- subpoenas

Eric,

The Receiver has not yet received a response to the subpoenas from your clients (Bobalew, Greg Grigorian, the Hylan entities, 6p LLC, and Andrew Shaevel).

When we spoke last week, you indicated that your clients objected to the breadth of the subpoena. We agreed that you would email me with a proposed limitation on the discovery. If your clients still wish to limit their production, please let me know immediately. Also, as you know, the deadline for responding to the subpoenas has passed. The Receiver

agrees to extend the production deadline for your clients to 9/21 at 4:00 p.m. Please feel free to call or email me with any questions.

Thanks,
Dave

David R. Doyle
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Chicago, Illinois 60654
Telephone (direct): 312.980.3864
Facsimile: 312.980.3888
E-mail: ddoyle@shawfishman.com

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GREGG SZILAGYI, not individually, but
solely as Court-appointed Receiver of Stark
Law, LLC, Stark Legal, LLC, Ashton Asset
Management, Inc., CHM Capital Group,
LLC, HKM Funding, Ltd., Pacific Capital
Holdings, Inc. and Aura Development, Inc.,

Petitioner,

vs.

6P LLC, BOBALEW LLC (d/b/a
BOBALEW VENTURES), ANDREW
SHAEVEL, GREGORY GRIGORIAN and
HYLAN ASSET MANAGEMENT LLC,

Respondents.

No.

**CERTIFICATE OF SERVICE OF NOTICE OF MOTION AND MOTION OF
RECEIVER WITH SUPPORTING MEMORANDUM OF LAW TO COMPEL
COMPLIANCE WITH SUBPOENAS**

I, LuAnn G. Spula, of Buffalo, New York, certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 2nd day of December, 2016, I served a copy of the within Notice of Motion and Motion of Receiver with Supporting Memorandum of Law to Compel Compliance with Subpoenas, together with all Exhibits and Civil Cover Sheet upon Lippes Mathias Wexler Friedman LLP (Eric M. Soehnlein, Esq., of counsel), attorneys for the Respondents, at 50 Fountain Plaza, Suite 1700, Buffalo, New York 14202, by depositing true copies of same enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.

I certify under the penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2016

s/ LuAnn G. Spula

LuAnn G. Spula

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

GREGG SZILAGYI, not individually, but
solely as Court-appointed Receiver of Stark
Law, LLC, Stark Legal, LLC, Ashton Asset
Management, Inc., CHM Capital Group,
LLC, HKM Funding, Ltd., Pacific Capital
Holdings, Inc. and Aura Development, Inc.,

Petitioner,

vs.

6P LLC, BOBALEW LLC (d/b/a
BOBALEW VENTURES), ANDREW
SHAEVEL, GREGORY GRIGORIAN and
HYLAN ASSET MANAGEMENT LLC,

Respondents.

No.

**CERTIFICATE OF SERVICE OF NOTICE OF MOTION AND MOTION OF
RECEIVER WITH SUPPORTING MEMORANDUM OF LAW TO COMPEL
COMPLIANCE WITH SUBPOENAS**

I, Carl Bachmann, of West Seneca, New York, certify:

That I am, and at all times hereinafter mentioned was, more than 18 years of age;

That on the 2nd day of December, 2016, I served a copy of the within Notice of Motion and Motion of Receiver with Supporting Memorandum of Law to Compel Compliance with Subpoenas, together with all Exhibits and Civil Cover Sheet upon Lippes Mathias Wexler Friedman LLP (Eric M. Soehnlein, Esq., of counsel), attorneys for the Respondents, by hand delivering true copies of same to said attorneys at their office address at 50 Fountain Plaza, Suite 1700, Buffalo, New York 14202,

I certify under the penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2016

s/ Carl Bachmann
Carl Bachmann